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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

APRIL GREN BAWDEN,
CHAD AUSTIN BAWDEN,
MAKAIO LYMAN CRISLER,
PHILLIP GANNUSCIA,
DUSTIN GARR, BARBARA JO JACKSON,
BRENT GOLDBURN KNUDSON,
ROBERT MCKINLEY, and
RICHARD SCOTT NEMROW,

Defendants.

Case No. 2:22-cr-481 CW

MOTION FOR PROTECTIVE ORDER

Judge Clark Waddoups
Chief Magistrate Judge Dustin Pead

The United States hereby moves the Court to enter a protective order related to the disclosure of evidence in this case. Specifically, the United States moves the Court to enter an order precluding the defendants and their counsel from making disclosures of the information included in the United States' discovery, other than as necessary to prepare for the defense in this matter

The discovery in this matter contains personal identifying information of witnesses and subjects of the underlying charges in this case. The disclosure of this information to third parties

could potentially put these witnesses and subjects in danger. Because of the volume of discovery in this case, and because the discovery is comprised of records containing a myriad of personal identifying information, redacting such information is not feasible. Moreover, discovery includes recordings not easily redacted. Therefore, the United States intends to provide un-redacted discovery to counsel for the defendants.

In order to balance the need for privacy with the need for disclosure, the United States requests that the Court enter the attached proposed order.

RESPECTFULLY SUBMITTED this 13th day of December, 2022.

TRINA A. HIGGINS
United States Attorney

/s/ Jamie Z. Thomas
JAMIE Z. THOMAS
Assistant United States Attorney